

COMMENT LETTERS & RESPONSES

#1. Thank you for your support. California State Parks (CSP) acknowledges there are shared boundaries between Anza-Borrego Desert State Park® and the Cleveland National Forest including hunting and delineation of boundaries and hunting areas. CSP will coordinate with the USFS to provide information to the public. For example, a link to the USFS could be established on the Anza-Borrego Desert State Park® website and newsletter.

#2. The California Department of Forestry (CDF) has a master file with acquired history on all fires that are 40 acres or larger within Anza-Borrego Desert State Park®. CSP has incorporated fire history into a Geographical Information System (GIS) database. Anything less than 40 acres has been recorded by park staff in the last 10 years (including lightning strikes). All information is located at the CDF Monte Vista Fire Station, area headquarters for San Diego County. Thank you for providing us with additional fire information and we look forward to working with you on these issues.



United States
Department of
Agriculture

Forest
Service

Cleveland National
Forest

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File Code: 1900

Date: March 3, 2003

Environmental Coordinator
Southern Service Center
California Department of Parks & Recreation
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108

Fax: 619-220-5400

Dear Sir or Madam:

Thank you for the opportunity to review the draft Anza-Borrego Desert State Park (ABDSP) General Plan and Draft Environmental Impact Report. Overall, I found the document well organized and descriptive information (particularly Section 2, Existing Conditions and Issues) well written with information understandable by the general public and natural resource specialists alike. Although we share less than 10 miles of common boundary, ABDSP and the Cleveland National Forest have common challenges in public land management, particularly public access and use, the conservation of endemic plants and animals and their habitat, and the protection of cultural and historic resources.

1 Section 2.1.3.2 states "hunting ... may have negative effects that cross from U.S. Forest Service Land to ABDSP." Although hunting is not allowed within State Parks or within National Parks and Monuments, there are no such restrictions on National Forest System lands, beyond California State hunting and fishing regulations promulgated by the California Department of Fish and Game and the State Fish and Game Commission. As hunting and off-highway vehicle use between our lands may prove problematic (particular where our common boundaries are not well delineated on the ground for the first-time visitor), I am recommending that our agencies explore methods of public information that could benefit both ABDSP and the Forest. A similar information exchange and availability to our publics could be utilized to identify the differences between our day use fee systems as well.

You state (in Section 2.1.3.2) that Forest Service "fire management policies ... may conflict" with ABDSP; however, from this text, it was difficult to determine if your area of concern is fuel management (prescribed burn and other vegetation management strategies) or suppression methodology.

2 I could not locate a fire history of ABDSP, in either map or tabular form, showing timeframes, area affected, and ignition source (escaped campfire, lightening, etc), including those fires which started within the Park and those which started elsewhere but affect the Park, directly or indirectly.

The following information is provided to assist in your display of fire suppression management information. The Cleveland National Forest maintains a resource guide for each



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#3. USFWS has designated Critical Habitat up to and along the Mexican Border. The Federal Recovery Plan (2000) cites recent abundance estimates north of the U.S.-Mexico border of 347, 276, and 334 animals (excluding lambs) for 1994, 1996, and 1998 respectively. It is likely that any construction activity or barrier development within this species' Critical Habitat may have negative effects. Proposals for the construction of international border structures through Anza-Borrego Desert State Park® have arisen in the past and have been opposed by state park staff. The text will be amended to highlight this issue.

#4. The goals and guidelines for 'Significant and Sensitive Biota' (Section 3.3.1.3) outline our intent to protect sensitive biota within the Park. This management guidance will apply in the event that California Condors released in the Southern California/Arizona area expand their range into Anza-Borrego Desert State Park®.

#5. Thank you for the correction. The appropriate changes will be made in the Final General Plan.

#6. Thank you for your comment. CSP anticipates that there will be increased public interest in the proposed Cultural Preserve and will take appropriate measures to protect the significant sites and resources within the preserve. The proposed preserve area is readily visible to park rangers. Additionally, a site-monitoring program will be established utilizing volunteer park stewards. It is anticipated that interpretive programs regarding the different resources within the site may be located at the Park Visitor Center or another location off-site.

#7. Please see Sections 3.3.1.2 Physical Resources and 3.3.1.7 Visitor Use and Opportunities in the Preliminary General Plan document (Page 3-36). Should the desired future conditions noted in this General Plan be compromised, existing improvements and management plans will be revised accordingly. Among the reasons our General Plans are developed at this level of detail is the desire to provide a meaningful document with longevity that allows for adaptive management with the resources, tools, and knowledge of the day. The goals and guidelines for *Significant and Sensitive Biota* (Section 3.3.1.3) present a clear preservation ethic for future management. If conflicts arise, up to date knowledge will be used to develop the solutions.

2 part of the forest to identify sensitive resource areas that require more careful planning in suppression approach. Our guide is used both during initial attack by Forest Service firefighters and for prolonged fires where management is delegated to an Incident Command Team (for both single and multiple agency jurisdiction). In addition, national forests in southern California operate under Minimum Impact Fire Suppression Guidelines for the management of fire (ground and aerial methods, for both fire suppression and campsite logistics and conduct) within wilderness areas; these guidelines can be considered "light on the land" and may be helpful to you in future pre-suppression planning with California Department of Forestry and Fire Protection (as ABDSP is in a State responsibility area). Members of the Forest's fire management staff are available to share with you information gained from our internal and multi-agency pre-suppression planning over the years.

Under funding from the National Fire Plan, the Forest has increased our efforts in hazardous fuel reduction (both area-wide prescribed burns and fuelbreak maintenance) to reduce the risks of catastrophic wildfire and threats to private property. Our 5-year fuels planning includes a project in the vicinity of Lost Valley (near our common border) and in the northern portion of our Laguna Recreation Area (also near one of our common boundaries). Forest staff can provide you with further information on these projects at your convenience, to supplement Section 3.3.1.3 of the draft Plan.

3 Section 2.2.2.3 includes information on the Peninsular Bighorn Sheep (pages 2-54 and -55) and discusses various threats to the species. However, I could not find information concerning this species' herd range and whether habitat connectivity would be affected by the physical barriers being placed at our international border.

4 Section 2.2.2.3 (page 2-57, Extirpated Species) does not consider more recent releases of California condors (in southern California and Arizona) and their potential range to include San Diego County (including ABDSP and the neighboring Cleveland National Forest). Protection efforts for this species, with a range that incorporates much of our command land management areas, was not located in the draft Plan.

5 Section 2.3.3.1 (Regional Plans) identifies "Southern California Forest Plan (USFS)"; please correct this item to read "Land and Resources Management Plans (USFS)". Both the Cleveland and the San Bernardino National Forests (land areas with common boundaries to ABDSP) are in the process of updating our forest plans. Further information on this coordinated Plan revision is provided below.

6 Section 3.2.4.6, Cultural Preserve Zone, proposes to designate the San Felipe Cultural Preserve with "an extremely low level of visitor impact." From our experience, designation of special areas (federal Wilderness Areas, among others) invites an increase in the number of visitors (to view the "special" area). Your plan may need to consider this Zone as an attraction and therefore the need to identify methods of reducing resource and visitor conflict.

7 Section 3.3, Goals and Guidelines, does not appear to address the effects of increasing population (and number of ABDSP annual visitors) on the various resource areas, particularly "Significant and Sensitive Biota", and the inherent conflicts that may arise in areas not yet affected. It would be helpful to have identified an array of active methods of resource protection (how area closures would be implemented, how the public would be re-directed to a less sensitive area, etc.).

#8. Currently Anza-Borrego Desert State Park® has 10 patrol rangers and an aircraft that are used for law enforcement and to identify and notify visitors located in hazardous areas. The proposed Information and Entrance Zones are intended to notify visitors of potential threats. Please see Section 3.2.4.1 in the Preliminary General Plan/Environmental Impact Report.

#9. Lucky 5 Ranch Acquisition and Public Use Improvements SCH# 2003021099 is a separate project from the Anza-Borrego Desert State Park® General Plan under CEQA.

#10. Thank you for your support and we look forward to the opportunity to participate in your planning efforts.

California Department of Parks and Recreation
Anza-Borrego Desert State Park

page 3

8 [Section 3.3.1.7 (Visitor-Use and Opportunities (Recreation)) identifies potential threat to visitor safety (page 3-38), while Section 3.3.1.11 (Infrastructure and Operations) identifies various hazards of facility placement. I was not able to locate a public notification process that would address occupation of flood-prone areas away from developed sites (such as open camping in the Backcountry Management Zone).

9 [We have received a copy of the February 19, 2003, Lucky 5 Ranch Acquisition Initial Study & Mitigated Negative Declaration and our comments on this planning effort will follow at a later date.

10 [The National Forests in southern California are currently updating our Land and Resource Management Plans, under the auspices of the Southern California Conservation Strategy (SCCS). These plans are programmatic in nature and reflect land use designations similar to your draft Plan, as well as goals (which we refer to as Desired Future Condition) and guidelines (which we will identify as Standards). I invite you to participate in our public review and comment process at your convenience; further information (including dates and locations of public meetings) can be obtained from the SCCS website at <http://www.r5.fs.fed.us/sccs> or by phoning toll-free 866-252-8846.

Thank you again for the opportunity to comment on your draft document. For items mentioned above for further coordination, feel free to contact me at 858-674-2919.

Sincerely,



BERNICE A. BIGELOW
Resource/Planning Officer

#11. CSP has welcomed public input into the planning process for Anza-Borrego Desert State Park® and is confident that the public was well-informed regarding the availability of the General Plan for public review under CEQA. The cover of the Anza-Borrego Desert State Park® Preliminary General Plan follows the approved CSP standards for General Plans. All the purposes of a General Plan are not listed on the cover but they are clearly explained in the introduction of the document. Approximately 1500 copies of the Notice of Availability were mailed to all agencies, organizations or individuals that are on the General Plan mailing list. This notice clearly identifies how the “General Plan/Environmental Impact Report” could be reviewed by the public, the review period, the locations the document was available for review, and a contact for questions. This data was also available on the Office of Planning and Research State Clearinghouse website and the Anza-Borrego Desert State Park® General Plan web Page of the CSP website. Those receiving copies of the General Plan had to request them based on the NOA. The Environmental Analysis Section of the General Plan is not an EIR, but rather, the entire document serves as the first tier EIR. Public Resources Code 5002.2 makes it clear that general plans are an EIR for CEQA purposes.

It has been the intent of CSP to fully engage the public into the General Plan process for Anza-Borrego Desert State Park®. To that end, there have been a total of 7 public workshops held in several different locations throughout southern California and individual scoping meetings with organizations representing off road vehicle, equestrian, and environmental protection interests. The General Plan process and the purpose of the General Plan have been explained at each of these meetings to allow the public to be well informed. The public review period was not officially extended for the Anza-Borrego Desert State Park® General Plan. The 45-day public review period (January 17, 2003 to March 3, 2003) was conducted in accordance with Public Resources Codes Sections 21092 (b), 21092.3, 21092.6, 21104, 21153 and CEQA guidelines Sections 15086, 15807, and 15105. However, as a courtesy to the public, late comments (March 4-March 17) are included in the public comment section with responses.

#12. The Preliminary General Plan/EIR discusses its compatibility with the Public Use Plan in Section 3.3.2.3 of the Preliminary General Plan/EIR (Page 3-47). It states that Coyote Canyon will continue to be managed in accordance with the Public Use Plan of 1995. The Coyote Canyon Public Use Plan and Feasibility Study represent specific public issues that were resolved independently of and prior to the General Plan. The appendices contain new data prepared to develop general planning zones, goals and guidelines for the General Plan. *The Ecological Conditions in Coyote Canyon, Anza-Borrego Desert State Park®, An Assessment of the Coyote Canyon Public Use Plan (2002)* would not have provided additional information to the public relative to the General Plan proposals. These three documents are relevant to the future planning efforts addressed in Section 3.4. For example, a Roads Management Plan will be prepared subsequent to the General Plan in accordance with CEQA guidelines 15168 and would be the appropriate place for reference of these documents. CEQA does not require all referenced documents to be included in an appendix. Re-circulation is only required if changes are made to the document that reflects or has substantial new environmental implications.

#13. The General Plan and its policies are clearly delineated throughout the document, not just at the environmental section. The substantial thrust of the General Plan is to protect and conserve the natural and environmental resources at the Park while allowing public access and recreation. The relatively small amount of development that may take place will have a minimal effect on the environment. Therefore, the Environmental Analysis section of the Preliminary General Plan is sufficient in that it references supporting resource and technical data/analysis contained elsewhere in the General Plan and its appendices. As previously stated, the entire General Plan document serves as the first tier Environmental Impact Report. Further, the level of detail addressed in the Environmental Analysis section is comparable to the level of detail provided in the land-use proposals of the Plan section. Tables 6.7 and 6.8 of the Environmental Analysis section provide quantitative data relative to the land use proposals in the rest of the General Plan. What is critical, and what is set forth in the General Plan, is adoption of a set of policies designed to minimize and mitigate impacts that might stem from future implementation projects.

As the goals and guidelines of the General Plan are followed, recreational opportunities within Anza-Borrego Desert State Park® will continue to provide for a variety of current and future demands. It is not anticipated that any action implemented as part of the General Plan would eliminate existing recreational activities in such a way that they would be forced to relocate outside of Anza-Borrego Desert State Park®. Therefore, implementation of the General Plan would not result in significant new environmental impacts to recreation areas outside of the Park nor contribute to cumulative impacts.

FEB-27-2003 THU 11:19 AM DPR DIRECTOR'S OFFICE

FAX NO. 916 657 3903

P. 03

Feb-26-2003 05:51pm From-SENATOR BILL MORROW

916 448 7362

T-682 P.002/002 F-466

11

a public notice indicating that the public comment period on the Plan/EIR has been extended for a minimum of 21 days, and that the reason for the extension is possible confusion regarding the "dual use" of the document.

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Apart from the document's misleading cover page, I am also concerned that the General Plan/EIR does not include as appendices the Coyote Canyon Public Use Plan ("PUP") or the report titled *Ecological Conditions in Coyote Canyon, Anza-Borrego Desert State Park, An Assessment of the Coyote Canyon Public Use Plan* (2002). Nor does the Plan/EIR even mention the Feasibility Study for Alternative Routes through Coyote Canyon (Dudek 1999). These are critical documents that relate to one of the most popular – and therefore most controversial – parts of the park. To exclude them from the appendices is to rob the public of key data necessary to evaluate the Plan/EIR intelligently.¹ Note also that the EIR does not discuss the proposed General Plan's compatibility with the PUP, as is required under CEQA Guidelines section 15125(d).

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Finally, the "Environmental Effects" section of the EIR – which is supposed to be the scientific core of the document – is woefully thin on analysis and supporting data. It is a mere eleven pages long and consists solely of summary conclusions regarding the impacts of the proposed General Plan. The Cumulative Impacts discussion, for example, takes up just one short paragraph, and it fails to mention cumulative recreation impacts at all. Even "first-tier" EIRs must demonstrate more technical rigor than this. Please consider making improvements to this document and recirculating it to the public. As currently written, it fails to serve as a "public disclosure" document as required under CEQA.

Very truly yours,


Senator Bill Morrow

Cc: Pete Conary, CLORV
David P. Hubbard, Esq.

¹ I have also learned that members of highly-involved stakeholder groups, including the California Off-Road Vehicle Association, were not furnished with the 2002 Ecology Study when it first became available. This tends to erode the trust between park users and the Department of Parks and Recreation.

California State Parks Response

No Response Necessary



Winston H.
Hickox
Secretary for
Environmental
Protection

California Regional Water Quality Control Board Colorado River Basin Region

73-720 Fred Waring Drive, Suite 100, Palm Desert, California 92260
Phone (760) 346-7491 • FAX (760) 341-6820



Gray Davis
Governor

February 5, 2003

Michelle Fredrickson
California Department of Parks and Recreation
8885 Rio San Diego Drive
San Diego, CA 92108

SUBJECT: NOTICE OF COMPLETION OF DRAFT ENVIRONMENTAL IMPACT
REPORT FOR ANZA-BORREGO DESERT STATE PARK GENERAL PLAN:
SCH # 2002021060

Your request for comments on the subject project was received at the Regional Water Quality Control Board, Colorado River Basin Region (Regional Board) on January 21, 2003. Regional Board staff reviewed the environmental document submitted and determined that the proposed project appears to have no impact on water quality. Thanks for the opportunity to comment on the project.

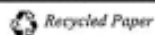
If you have further questions on this matter, please contact me at (760) 776-8968.

Osabuogbe C. Igbinedion
Senior Water Resource Control Engineer

OCI/oci

File: ER SD ED

California Environmental Protection Agency



#14. Thank you for your comments and support.

#15. This comment will be incorporated into the Hydrology Section of the Final General Plan, Section 3.3.1.2.

#16. Thank you for sharing your thoughts on how we might better communicate the GP information (re: maps). After considering your comment, the team has decided that additional close-up maps will be provided in the Final General Plan.

#17. The Wetland Riparian Zone that was considered through the development of alternatives was not included in the preferred alternative. The description of this zone was included in Table 6.6 to aid in public review of the alternatives. Figure 7.5 should be recognized as a ‘Generalized Habitat Map’, and not a map of management zones; the wetland riparian areas identified are not the management zones considered in the alternatives. The discussion on 2-36 is likewise not a management zone description, but that of a general habitat found in the Park. We eliminated the Wetland Riparian Management Zone because we felt that the management reality of such a zone across the entire Park would be steeped in difficulties related to the visitor’s ability to recognize the zone, the variability in the zone’s distribution through time, mapping inadequacies, and enforcement uncertainties. We feel that a detailed description of the diversity and sensitivity of wetland and riparian habitats throughout the Park (Section 2.2.2.3), as well as goals and guidelines (Section 3.3.1.3 ‘Significant and Sensitive Biota’) which direct management intent for these areas, is a more appropriate strategy for management of a widely distributed habitat with a General Plan.



SAN DIEGO AUDUBON SOCIETY

4891 Pacific Highway, Suite 112 • San Diego, CA 92110 • 619/682-7200 • Fax 619/682-7212

February 27, 2003

Project Director, ABDSP General Plan Team
California State Parks – Southern Service Center
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108

Dear Project Director:

The San Diego Audubon Society appreciates the opportunity to comment on the Anza Borrego Desert State Park Preliminary General Plan.

In general, we can support either the Preferred Plan or the Environmental Alternative, although we have a few concerns and suggestions as noted below.

We particularly commend the new Declaration of Purpose, Park Mission Statement, and Vision Statement that appear on pages 3-6 and 3-7, particularly their emphasis on resource protection and stewardship as the primary park goals.

We strongly endorse the goal on p. 3-45 to increase field staff, and encourage the State legislature to provide adequate funds to accomplish this. We also endorse all the Area-Specific Goals and Guidelines on pp. 3-45 to 3-49, especially those relating to Coyote Canyon and Indian Canyon.

We have two suggestions:

- Under "Hydrology" (p. 3-19), in the Goal we would recommend including the words "and groundwater basins" between the existing words "watersheds" and "throughout". Although we understand that the Park cannot control land use in Borrego Springs, we would like to see some expressions of concern added to the plan concerning the long-term effects on the Park of the current severe overdraft of water in the valley.

- We would suggest that more "close-up" maps be provided. The two that were included were helpful, and additional ones would be useful.

We are concerned about one apparent significant change:

What happened to the Wetland-Riparian Zone in the Preferred Alternative? This zone was included in the draft maps, and is still mentioned in the management matrix (Table 6.6) and in Table 6.7 for other alternatives, and is shown in Figure 7.5, but it has disappeared from the text and from the maps for all alternatives. Although a heading "Wetland and Riparian Areas" is included in the Existing Conditions section (p. 2-36), it is not discussed in sections 3.3.1.2 under Hydrology nor 3.3.1.3 under Significant Biota, nor in section 3.4.5 (Natural Resources Management Plan). It may be

#18. Camp stores and concessions are currently allowed in areas designated as “State Park.” The General Plan proposes to limit potential new facilities of this type to the approximately 2,200-acre area of Focused-Use Zone I. The Department believes that these potential facilities can be appropriate in this management zone given the right circumstances. If actual facilities are proposed in the future, they will be subject to public review under CEQA.

#19. The Final General Plan will be changed to incorporate the following wording in the Preliminary General Plan, “cars may pull off these roads one vehicle width, as long as no wildlife or vegetation is destroyed. Some areas may contain sensitive resources and therefore, exception to camping will be posted for resources protection purposes (Page 3-15).”

#20. The preferred plan addresses six management zones. The creation of further “specifically designated off-road camping areas” introduces further complexity that we feel is not needed. The ability to open camp is allowed throughout the Backcountry and Wilderness Zones; and camping will be addressed park-wide in The Camping Management Plan. The Backcountry Management Plan has been renamed as the Camping Management Plan throughout the General Plan.

#21. The large zone allows CSP the option to expand or relocate camping within FUZ II areas. Such zoning also provides for closer monitoring of visitor impacts upon resources within the area (which currently serves as a well-liked & highly visited campground).

#22. Extensive fieldwork and documentary research identified a large number of highly significant cultural and natural resources within the preserve zones shown in the Environmentally Superior Alternative (Alternative 3). These preserve designations would provide additional measures of protection and were requested by Native American representatives

#23. Thank you for your comments and support.

that it is felt this topic is adequately covered under other Plan headings, but where is not clear, and it is very confusing that is still included in Tables 6.6 and 6.7, but is absent from the Preferred Alternative. It needs to be made clearer how the Preferred Alternative will carry out these very necessary Wetland-Riparian objectives, and why no separate category for them exists in the Preferred plan when Table 6.7 shows it in other alternative plans?

We continue to have concerns about the following provisions:

- We still feel that "camp stores and concessions" and "lodging" should not be listed as new acceptable uses in FUZ-1. These can, and should, be carried out as needed by the private sector in adjacent communities. The park does not need to permit new facilities of these types within the park.

- In the Wilderness Zone (WZ), we are still concerned about the provision (p. 3-15) stating "Vehicles . . . may be parked off the road one vehicle width". This implies parking *anywhere* along the road. This wording would allow the destruction of significant vegetation or habitat along the road by people who see it as "just bushes", and don't realize that small animals take refuge there. We continue to ask that specific pull-off areas be provided and marked, and random pulling off onto the (often very loose) roadside sand prohibited elsewhere.

- Similarly, we are concerned about the "open camping" provision in the same WZ section. Although the Plan provides that selected areas can be designated as off limits to camping, we feel there may need to be a great many of these, which would be hard to enforce. It would seem to make more sense to have specifically designated off-road camping areas in the WZ. We note that (p. 3-49) a Backcountry Camping Plan will be developed; we would urge that this Camping Plan be expanded to include the Wilderness Zone, and to designate specific camping areas.

- We applaud the absence of any FUZ-1 or FUZ-2 along the lower portion of S-2; however, why does the FUZ-2 zone at Bow Willow need to extend all the way out to S-2? Such a large zone is not necessary to continue the existing primitive camping area there, or is it planned to extend it?

- In the Environmental Alternative, we wonder if the Cultural Zone needs to be quite as extensive as is shown?

It is clear that much thought and work has gone into the preparation of this Preliminary General Plan, and we thank you for inviting our comments. Either the Preferred Alternative or Environmental Alternative will go far towards perpetuating the Park as one of America's finest protected landscapes. We thank you for considering our additional suggestions.

For the San Diego Audubon Society,



Philip R. Pryde

ABDSP specialist for the SDAS Conservation Committee

#24. Thank you for your input. Your organization remains on the Department mailing list and you will receive all public notices regarding this General Plan. Please see Section 4.4.4 in the General Plan. Alternative 3 provides additional protection to sensitive resources, but it has the potential to cause a significant adverse impact to certain recreation activities including highway-legal vehicle use, equestrian use, mountain bike use, and open camping. These activities would be restricted in a Natural/Cultural Preserve.



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March 3, 2003

California State Parks
8885 Rio San Diego Drive, #270
San Diego CA 92108
619.220.5400 fax

24

On behalf of our over 7500 members in California and the nation, we support alternative 3 – the “environmentally superior” alternative – for future management of Anza-Borrego Desert State Park.

Please keep us fully informed as the Plan/EIR process evolves.

Thank you,

Daniel R. Patterson
Desert Ecologist

Tucson • Idyllwild • Silver City • Phoenix • Oakland • Bozeman • Buxton NC • San Diego • Sitka

DANIEL R. PATTERSON, DESERT ECOLOGIST

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#25. CSP respectfully disagrees. The General Plan addresses the protection of cultural resources in Sections 3.3.1.4 and 3.4.4. Cultural Resources are also protected by current cultural resource management directives, CEQA, and Public Resources Code 5024 and 5024.5. The Goals and Guidelines of the General Plan propose cultural resource protection, and CSP intends to begin work on the Public Use Interface Element of the Cultural Resource Management Plan, Road Management Plan and Camping Management Plan after the General Plan is finalized. The element of the Cultural Resource Management Plan will be used in the development of the Camping and Road Management Plans. CSP believes that addressing cultural resource issues in public use areas will provide appropriate guidance for the delineation of camping locations and road routes. These plans will include extensive surveys of cultural resources and an evaluation of findings based on data to determine if additional management actions are necessary to protect the resources. Additional Cultural Preserves may be delineated as a result of findings. Additional plans to be completed also include Natural Resource Management Plan, Trail Management Plan, Interpretive Management Plan, Facility Management Plan, and remaining elements of the Cultural Resource Management Plan. Each plan would be subject to CEQA review, addressing cultural resources, as it is prepared.

#26. Please see Response #25. Please see Sections 3.4.4, 3.3.1.4, and 4.5.3.5 in the General Plan. A Cultural Resource Management Plan, subsequent to the adoption of the General Plan, will identify, evaluate, and provide further recommendations for cultural resources. Increasing the wilderness designation will provide an additional level of protection to cultural resources because vehicles and other potentially invasive uses such as utility corridors will be limited to existing roads and roadside areas (Roads are not a part of the Wilderness Zone).



Save Our Heritage Organisation

2476 San Diego Avenue • San Diego CA 92110 • 619/297-9327 • www.sohosandiego.org

January 23, 2003

Robert Patterson
California State Parks
8885 Rio San Diego Drive
Suite 270
San Diego, CA 92108

Dear Mr. Patterson:

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Tim Rudolph
David Swarens

Bruce Coons,
Executive Director

25

Save Our Heritage Organisation (SOHO) is sending this letter of comment on the General Plan for Anza-Borrego Desert State Park during the public review period to emphasize our concern over the lack of protection for historic resources within the park. We previously sent a letter asking for additional protection for historic and prehistoric archaeological sites in the park.

There are over 4,000 known historic and prehistoric cultural resources within Anza-Borrego Desert State Park. These resources include rock art, sleeping circles, midden sites, historic features and structures, and sensitive ceremonial areas. Although their presence within the State Park provides a level of protection, these unique, sensitive resources receive no special protection in the General Plan recommendations.

26

We note that the plan has only one designated Cultural Preserve. You state that the plan will use other means to protect cultural resources, but additional Cultural Preserves need to be identified for the park to provide permanent protection. This can be done without compromising the resources protected within these areas. Designation of culturally sensitive areas as "Wilderness" does not provide adequate protection for the historic and prehistoric sites in Anza-Borrego Desert State Park. There should be no camping and only limited access to areas containing sensitive cultural resources. Once cultural resources are damaged, they are lost forever.

Please help SOHO protect our County's heritage for future generations. We appreciate your support and cooperation.

Sincerely,


Bruce Coons

#27. Thank you for your comment. The San Diego Archaeological Center has been added as a potential partner in section 3.3.1.5 of the General Plan.

#28. Each Plan would be subject to CEQA, including evaluation of potential impacts to cultural resources and consistency with the General Plan and other management plans.

#29. Please refer to responses #25 and #26. The proposed Cultural Resource Management Plan, Camping Management Plan, Road Management Plan and Trails Management Plan will provide, along with the existing departmental cultural resources directives, adequate protection while allowing recreational users access to those areas that are not significant prehistoric/historic sites.



San Diego County Archaeological Society, Inc.

Environmental Review Committee

24 February 2003

To: Patricia K. Autrey, Environmental Coordinator
Southern Service Center
California Department of Parks and Recreation
8885 Rio San Diego Drive, Suite 270
San Diego, California 92108

Subject: Draft Environmental Impact Report
Anza-Borrego Desert State Park General Plan

Dear Ms. Autrey:

I have reviewed the cultural resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DEIR and Draft General Plan, we have the following comments:

- 27 [(1) In Section 3.3.1.5, Interpretation, the second goal lists possible partners for interpretive programming and environmental education. We suggest including the San Diego Archaeological Center at San Pasqual among the possible partners.
- 28 [(2) Section 3.4, Future Planning Efforts, lists a series of management plans to be developed subsequent to adoption of the General Plan. Many of these will relate very strongly to cultural resources, so the Cultural Resources Management Plan (Section 3.4.4) must be a leading element of these proposed plans. We request being included in the review process for this plan as it is developed. Also, we note the need to link this management plan to the topic of collections.
- 29 [(3) Obviously, viewed strictly from the perspective of cultural resources, the Environmentally Superior Alternative is most desirable. Considered in the broader perspective of the various elements of ABDSP, we can appreciate that compromises are necessary and we trust that the mitigation measures presented would, at the level of individual projects, address the relevant cultural sites and features. There may be some options for a middle ground between the Preferred Plan and Environmentally Superior Alternative, however, and we urge that possible adjustments in that direction be considered.

#30. We will maintain your organization on the mailing list.

#31. Thank you for your comment. Please see Sections 3.4.4 and 4.5.3.5 of the General Plan. Recovery Plans for archaeological resources would include curation, when warranted. Curation requirements will also be incorporated into future project plans. Currently there is a curation facility and a qualified collections manager on staff at the Park, and active planning has begun for construction of an archaeological center at the District office complex.

- 30 [(4) The sheer size of ABDSP makes review of individual areas difficult, particularly without information on the sites involved. We therefore will add to our commendation of the sensitive efforts made thus far by the General Plan authors, a request that we be provided the opportunity to review the environmental documents for specific projects.
- 31 [(5) The mitigation measures for cultural resources listed in Section 4.5.3.5 of the DEIR are general, as is necessary at this point in time, and adequate. More specific mitigation measures will be necessary on a project-by-project basis. Perhaps the only addition we would like to see is specific mention of curation of resulting archaeological collections and the associated records.

Thank you for providing these documents to SDCAS for our review and comment.

Sincerely,


James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: SDCAS President
File

#32. CSP acknowledges that the comment letter from David Hubbard at Lounsberry, Ferguson, Altona, & Peak LLP represents CORVA, SDORC, AMA-37, and ORBA on matters affecting the Preliminary Anza-Borrego Desert State Park® General Plan/Environmental Impact Report. CSP respectfully disagrees that the General Plan/EIR is deficient as a matter of law. Please see response #13

#33. CSP respectfully disagrees. The General Plan does address all items noted. Please see subsequent Responses to your letter #34-39 for more specific information and Response #13.